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18 *Attorneys for Defendant*  
19 *Michael Halprin*

20 **UNITED STATES DISTRICT COURT**  
21 **DISTRICT OF NEVADA**

22 UNITED STATES OF AMERICA,  
23  
24 Plaintiff,

25 vs.

26 MICHAEL HALPRIN,  
27  
28 Defendant.

Case No.: 2:19-cr-00154-RFB-MDC

**JOINT STIPULATION TO CONTINUE  
DEFENDANT HALPRIN'S SENTENCING  
HEARING SCHEDULED FOR  
FEBRUARY 22, 2024**

IT IS HEREBY STIPULATED AND AGREED by and between JASON FRIERSON,  
United States Attorney, District of Nevada, and NADIA AHMED and JACOB OPERSKALSKI,  
Assistant United States Attorneys, representing the United States of America, and LOUIS  
PALAZZO, NATHAN GARRETT, and LUCINDA LUETKEMEYER, representing Defendant  
Michael Halprin, that the sentencing hearing scheduled for February 22, 2024, at 9:15 a.m., in

1 the above-captioned matter, be vacated and continued to a date and time to be set by this  
2 Honorable Court but no sooner than March 24, 2024.

3 This stipulation is entered into for the following reasons:

4 1. Sentencing in this matter is currently scheduled for February 22, 2024, at 9:15 a.m.

5 2. On January 5, 2024, counsel for co-defendant Eghomware Igbinovia, aka Jerry Igbinovia,  
6 and the government jointly moved to continue the calendar call and trial date. The calendar call  
7 is now scheduled for February 27, 2024 and trial is now scheduled for March 25, 2024. Dkt. Nos.  
8 386 and 387.

9 3. Defense counsel needs additional time to investigate issues relevant to sentencing and  
10 prepare for sentencing.

11 4. Mr. Halprin has appeared in this case, and is not in custody and, along with the  
12 government, agrees to this continuance.

13 5. The additional time requested herein is not sought for purposes of delay and the denial of  
14 this request for a continuance could result in a miscarriage of justice.

15 6. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing  
16 hearing for good cause. Good cause exists in this case.

17 7. Counsel for Defendant Michael Halprin and the government agree a continuance of the  
18 sentencing hearing is in the best interests of justice.

19 8. For all the above-stated reasons, the ends of justice would be best served by the  
20 continuance of the sentencing hearing.

21 This is the fifth request for a continuance of the sentencing hearing.  
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1 DATED: January 18, 2024

2 By *Isl Nathan F. Garrett*

3 GRAVES GARRETT, LLC

4 Nathan F. Garrett, *pro hac vice*

5 Lucinda H. Luetkemeyer, *pro hac vice*

6 PALAZZO LAW FIRM

7 A PROFESSIONAL LAW CORPORATION

8 T. Louis Palazzo, Esquire

9 *Counsel for Defendant Michael Halprin*

10 JASON FRIERSON

11 United States Attorney

12 By *Isl Jacob Operskalski*

13 Jacob Operskalski

14 Assistant United States Attorney

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1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 MICHAEL HALPRIN,

7 Defendant.

Case No.: 2:19-cr-00154-RFB-MDC

**JOINT STIPULATION TO CONTINUE  
DEFENDANT HALPRIN'S SENTENCING  
HEARING SCHEDULED FOR February  
22,2024**

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9 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
10 Court finds that:

- 11 1. Sentencing in this matter is currently scheduled for February 22, 2024, at 9:15 a.m.
- 12 2. Defense counsel needs additional time to investigate issues relevant to sentencing and  
13 prepare for sentencing.
- 14 3. Mr. Halprin has appeared in this case, and is not in custody and, along with the  
15 government, agrees to this continuance.
- 16 4. The additional time requested herein is not sought for purposes of delay and the  
17 denial of this request for a continuance could result in a miscarriage of justice.
- 18 5. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a  
19 sentencing hearing for good cause. Good cause exists in this case.

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22 For all of the above-stated reasons, the ends of justice would best be served by an order  
23 vacating the current sentencing hearing date and continuing the sentencing hearing date no  
24 sooner than March 25, 2024.

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**ORDER**

IT IS HEREBY ORDERED that the sentencing hearing currently scheduled for February 22, 2024, at the hour of 9:15 a.m., be vacated and continued to **April 25, 2024 at 8:30 a.m.** ,

DATED this 22nd day of January, 2024



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THE HONORABLE RICHARD F. BOULWARE  
UNITED STATES DISTRICT JUDGE